ATTACHMENT 3

From: Change Control [mailto:Change.Control@BELLSOUTH.COM]
Sent: Tuesday, September 21, 2004 4:14 PM
To: Jureidini, Jordana M, NEO
Subject: RE: 04/06/04 BST/CLEC Bulk Migration Meeting Materials

Jordana,

The cap is 70 total DLC per CO for a single day.

One CLEC could order all 70 IDLC conversions available as well as an additional 55 CO cuts to reach their 125 max in that office for that day. If a second CLEC requested a bulk on that same date, which included IDLC, after the first CLEC request has been received, the scheduling tool would show 0 (zero) IDLC available and 75 CO cuts available remaining.

200 total available CO and IDLC cuts (max of 70 IDLC)
- 70 IDLC reserved (maximum)
- 55 CO cuts reserved
75 remaining CO cuts for another CLEC(s).

Examples:

1) If one CLEC ordered the max 70 IDLC conversions available for that office on that day, no other CLEC could reserve time for any other IDLC conversion in that office for that day . However, they would still be able to order any remaining available CO only cuts.
2) If 2 CLECs ordered 50 IDLC conversions each, BST will still utilize the 70 cap max. Therefore, the first requesting CLEC that reserved the time for 50 IDLCs would be granted the reservation for 50. The 2nd CLEC requesting 50 would only be able to reserve 20. The additional 30 IDLC conversions would have to scheduled for another day.

Hope this helps.

Steve Hancock
Change Management Team

-----Original Message-----
From: Jureidini, Jordana M, NEO [mailto:jureidini@att.com]
Sent: Tuesday, September 21, 2004 11:40 AM
To: Change Control
Subject: FW: 04/06/04 BST/CLEC Bulk Migration Meeting Materials

Change Control,

This PP presentation indicates that CLECs can cut up 125 lines per CO per day, and up to 70 of those lines can be IDLC. I need clarification on whether the 70 for IDLC is a cap per CLEC or per CO. For example, if 2 CLECs ordered 50 IDLC each on a given day, would BST work all 100?

I'd appreciate a response by Wednesday, September 29th.

Thank you,

Jordana

Jordana Jureidini
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ATTACHMENT 4

BELLSOUTH

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June 20, 2002

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is a follow up to our May 15, 2002 lunch discussion, as well as a follow-up to Jim Schenk's May 29, 2002 interim letter to your May 17, 2002 letter, concerning AT&T's use of multiple company codes. Following is BellSouth's response to each question:

1. Types of AT&T orders presently falling out for manual processing

Service requests from AT&T that are affected by the multiple Access Customer Name Abbreviation (ACNA) problem are those orders placed by one AT&T/ACNA entity designating assignment to collocation arrangements with dissimilar ACNA information. This applies to all service requests that involve collocation when the ACNA of the ordering company does not match the ACNA of the collocation arrangement. In many locations, AT&T established its collocation arrangements with the ACNA "ATX", for AT&T, but places service requests to those collocation sites using the ACNA "TPM", for Teleport Communications Group. A list of these specific collocation sites is attached.

2. Define code causing BellSouth the problem

As stated above, the specific root cause of this problem is AT&T's service requests containing an ACNA that is in conflict with the ACNA of the collocation arrangement identified on the service request. AT&T should be aware that industry standards set by National Exchange Carrier Association (NECA) and Telcordia prescribe that all codes should be used consistently.

3. Causes for orders to "fall out" for manual handling

When a CLEC orders collocation space from BellSouth, the collocation "address" is established using the ACNA of the ordering CLEC, which is built into the cable identification (ID). It is BellSouth's policy not to accept assignments from CLECs other than the owner of the collocation space and associated cable assignments. Therefore, BellSouth's ordering and provisioning systems contains edits to prevent unauthorized assignment of its customers' collocation assets. As stated above, the service requests in question are issued by AT&T with ACNAs that do not match the ACNA of the collocation arrangement designated on the service

request and, as a result, appear as though AT&T is making assignments to a different CLEC's collocation space. BellSouth must take several "out-of-process" steps to accommodate AT&T's conflicting assignments, which have come about due to AT&T establishing collocation arrangements with BellSouth initially using the ACNA of "ATX" and then places service requests to those collocation spaces using an ACNA of "TPM."

In the past, at AT&T's request, BellSouth created duplicate, additional collocation Access Customer Terminal Location (ACTL) Common Language Location Identification (CLLI) codes. This additional step has allowed BellSouth's service centers to process AT&T's Local Service Requests (LSR) without clarification. However, when the facility assignment on AT&T's service request does not match BellSouth's facility records of the collocation arrangements, additional facility assignment edits disrupt the order flow, requiring investigation of the mismatch, follow-up with the service center, and manual intervention to resolve the service order/records conflict.

4. **Additional steps taken by BellSouth to process the orders**

In addition to the steps required to create the supplemental ACTL CLLI code, as stated above, facility assignment errors must be investigated, reviewed with the service center and manually overridden before the order can be completed.

5. **Date BellSouth realized the necessity to manually process and work around these specific types of orders**

BellSouth has known from the outset that AT&T's request to make collocation facility assignments using conflicting ACNA information was outside of the process and required additional manual intervention to create the additional collocation ACTL CLLI codes and to resolve the downstream errors created by the conflicting information provided by AT&T.

6. **Implementation of the "firewall" that prevents one company from using another's facilities or assets?**

These edits have been in place by BellSouth since divestiture.

7. **Number of orders falling out for manual handling each month due to the use of multiple company codes**

AT&T has provided BellSouth a forecast of approximately 400 Unbundled Network Element (UNE) Loop orders per month for the next 6 months. Any of these orders placed with the ACNA "TPM" to collocation sites ordered with ACNA "ATX" are outside of the process and will require manual handling to complete, as would any interconnection trunk requests using the "ATX/TPM" ACNA combination.

8. **Action planned by BellSouth as of June 15, 2002**

As BellSouth advised AT&T on May 29, 2002, due to AT&T's expressed interest in pursuing the use of a single ACNA, BellSouth has elected to make no changes at this time on the existing collocation arrangements where duplicate collocation ACTL CLLI codes have been established. Please refer to the attached list of collocation sites for which supplemental ACTL CLLI codes were established.

9. **Embedded base of customers/orders/facilities**

The embedded base of circuits would require a Transfer of Ownership to convert the ACNA to match the collocation ACNA. BellSouth's Professional Services team has procedures in place to manage the associated order activity.

10. **Alternative solution**

Currently, AT&T is negotiating with its BellSouth Collocation Account Team regarding the development of collocation inventories that will provide AT&T circuit details, including the circuit number and/or telephone number. BellSouth anticipates that the detail supplied would provide AT&T with more than enough information to identify the assets of each of AT&T's entities.

I hope the above information supports AT&T's understanding of the current out-of-process situation and its affects on AT&T's service order flow. Regarding your request for a meeting with all of BellSouth's Subject Matter Experts (SME) on this subject, I believe that you and Jan Flint agreed on June 11, 2002, that pending further investigation by BellSouth on a long-term solution to this issue, a meeting would not be productive at this time. If I can be of additional help, please let me know.

Sincerely,

Attachment

ATTACHMENT 5

BELLSOUTH

BellSouth Interconnection Services
600 North 19th Street
8th Floor
Birmingham, Alabama

James M. Schenk
Sales AVP
205-321-4700
Fax 205-321-4757

July 21, 2003

Ms. Denise Berger
AT&T Operations – Assistant Vice President
1200 Peachtree Street NE
Room 12256
Atlanta, GA 30309

Dear Denise:

This is a follow up to telephone conversations and e-mails between BellSouth and AT&T concerning AT&T's use of Secondary Access Customer Terminal Locations (ACTLs) to Collocation sites. The Secondary ACTL process AT&T is currently utilizing requires manual processing in order for the service order(s) to flow through BellSouth's systems. The Federal Communications Commission (FCC) has issued a mandate that requires BellSouth to utilize an automated ordering process. For this reason, BellSouth has no plans to continue accepting service orders that require manual processing. AT&T has indicated there are nine (9) "FIM" Access Customer Name Abbreviation (ACNA) sites and an additional 15 "ATX" ACNA sites where a Secondary ACTL arrangement is needed.

BellSouth has previously recommended the following options to accommodate AT&T service orders while simultaneously meeting the mandated automated service order standards:

- **Use of a Single ACTL/ACNA at each Collocation Site**

  The specific root cause of this problem is AT&T's service requests that contain an ACNA in conflict with the ACNA of the collocation arrangement identified on the service order AT&T should be aware that industry standards established by the National Exchange Carrier Association (NECA) and Telcordia subscribe to the premise of utilizing all codes consistently Thus the option shown below :

  Use the "Transfer of Ownership" process to convert sites to one ACNA This option eliminates the need to process orders for more than one ACNA at each site

- **Accept the New Business Request (NBR) Option offered to convert BellSouth Databases to allow "Dual" ACNA Orders to flow through the BellSouth systems**

  In 2001, BellSouth worked with AT&T to develop a NBR for mechanization This mechanization upgrade (involving 86 systems) would allow multiple ACNA orders to flow through BellSouth's systems without manual intervention

Unfortunately, AT&T has rejected both of these options while requesting that BellSouth continue to manually process these service orders. Due to the FCC mandate and because of the costs of manually processing a service order, AT&T's request is unacceptable to BellSouth. In an effort to resolve this issue, BellSouth has continued to research additional options that would provide an "Order Flow Through".

The following proposal is an arrangement contained in the AT&T Interconnection Agreement that meets industry standards and allows valid service orders to flow through without manual intervention. BellSouth recommends the existing Secondary ACTL sites, additional 9 FIM sites, and 15 ATX sites use the following option to accomplish the Secondary ACTL requirement:

- <u>Use the 'Guest/Host' Collocation Arrangement to Establish a Guest Presence</u>

  Under this Collocation arrangement, each Host/Guest ACNA has unique ACTL and Connecting Facility Assignments (CFA) in the cage. The Host places a Collocation Augment Application, pursuant to its Interconnection Agreement, and submits a Letter of Authorization for the new entity (Guest). With the Guest/Host arrangement, a 30-day freeze would not be required provided applications are placed for new CFA facilities. The freeze would apply if existing CFAs were converted to a new ACNA. In addition, service order charges would apply to any services terminating in the collocation site involved in the change.

  Estimated costs to convert or add CFAs were previously provided for the ATX FTLDFLCY Collocation Site. (See Attachment.) The Guest/Host arrangement would allow orders to flow through without manual intervention since each ACNA would have a CFA and ACTL assigned in the collocation cage.

Please refer to AT&T's Interconnection Agreement or contact your Regional Collocation Manager for additional information about the Guest/Host Collocation Arrangement.

AT&T has indicated it was taking steps to resolve the need for multiple ACNA orders. Please advise BellSouth of the option AT&T prefers, thus eliminating the need for manual intervention on future service orders.

Should additional information be needed, please feel free to contact me at 205 321-4700.

Yours Truly,

ORIGINAL SIGNED BY JIM SCHENK

Attachment

Estimated Charges to add [illegible] Florida Application [illegible]							
Type Charge per [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Subsequent Application Fee	PE1CA	NRC	1	$2,236.00	$2,236.00		
Cable Records fee per request	PE1CR	NRC	1	$980.22	$980.22		
VGDS0 per application	PE1CD	NRC	1	$656.50	$656.50		
VGDS0 per 100 pair	PE1C0	NRC	3425	$9.66 per 100 pair	$330.86		
DS1 PER T1TIE	PE1C1	NRC	280	4.52 per T1TIE	$1,265.60		
DS3 per T3TIE	PE1C3	NRC	48	15.82	$759.36		
Total estimate of augment[illegible] w/cable records	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

ATTACHMENT 6

PROPOSED "JOINT TEST PLAN"

Introduction

On June 29, 2004, the Michigan Public Service Commission (MPSC" or "Commission") issued its "Order Establishing Batch Cut Migration Process" in Case No. U-13891 (the "Order"). The Commission approved a batch cut migration process, also known as a batch hot cut process (together "BHC"), as described in the Order, on an interim basis. The Commission also directed interested parties to engage in collaborative discussions regarding testing of the interim BHC process and to reach agreement regarding the content and testing of a final BHC process. (Order at 23.)[1]

In particular, the Commission found that "there must be appropriate testing" of the SBC "modified" batch hot cut processes in order "to make sure the batch cut migration processes *will work as anticipated* in a real environment." (Order at 22, (emphasis added)). The Commission further clarified that such testing would allow the Commission (and the parties) "to evaluate" whether "SBC is capable of migrating multiple lines in a timely manner" and whether the BHC migration process "will work as anticipated in a real world environment." The batch migration process allows multiple batches from multiple companies simultaneously. In this regard, the Commission stressed that the test "should include real world examples of batch cut migrations performed by SBC." *(Id.)* The Commission directed the parties to "submit a joint plan" for testing by August 10, 2004 "that is modeled after SBC's managed introduction plan." Thereafter, parties will have the opportunity to file comments on that plan within two weeks, or August 24, 2004, and testing should begin as soon as possible. *(Id.)*

This Joint Test Plan ("JTP") is based on pseudo testing and commercial deployment using actual customer accounts. The collaborative discussions reached an impasse regarding the issue of whether testing should be based on commercial use or "pseudo" test lines. By submitting this JTP no party is precluded from arguing that a test plan either should, or should not, be executed in a lab environment.

Scope of Test Plan

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[1] This footnote shows the position of SBC Michigan on certain matters. SBC Michigan is participating in these proceedings as required by an Order of the Michigan Public Service Commission entered on June 29, 2004 in Case No. U-13891 (the "Order"). The Order, and these continued proceedings, purport to implement certain requirements of the FCC's vacated *Triennial Review Order* ("*TRO*"). (See MPSC Order at 18.) The Order is in conflict with the D.C. Circuit's decision in *United States Telecom Ass'n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004). ("*USTA II*") In that decision, the D.C. Circuit held that the federal law pursuant to which this proceeding is being conducted is unlawful. Accordingly, the MPSC's Order is unlawful. On July 7, 2004, SBC Michigan filed its Complaint for Declaratory, Injunctive and other Relief in the United States District Court for the Eastern District of Michigan. See *Michigan Bell Telephone Company v. J Peter Lark, et al.* Civil Action No. 04-60128. ("*Michigan Bell*"). By participating in these proceedings and submitting this JTP, SBC Michigan does not waive, but expressly reserves, all rights under the D.C. Circuit's decision in *USTA II* and in its pending action in *Michigan Bell*.

This test plan is designed to test the ordering, provisioning and performance measurement monitoring aspects of SBC Michigan's proposed BHC process. In Stage One of the process, the test simulates the migration of working "hot" lines from one carrier's switch to another carrier's switch using the SBC BHC and associated operational support system (OSS). In Stage Two, the test monitors SBC's BHC process when used to migrate actual customer lines using SBC's Managed Introduction Process.

The Test Plan outlines and provides details on the two stages of testing. Stage One employs the use of pseudo customers or test lines to allow, on a limited basis, an analysis of the manner in which SBC Michigan's systems will perform in an actual environment of multiple carriers submitting commercial volumes of orders. In a select group of SBC central offices, the test will involve daily hot cut volumes on a par with that which could be expected in a competitive environment in which UNE-L replaces UNE-P as the primary CLEC service platform. In this manner, the test is designed to provide volumes of hot cuts that SBC would ***likely not*** face during early commercial use of the BHC process. A key aspect of this portion of the test plan is that it does not put Michigan UNE-P customers at risk. The first period of testing (prior to the MIP) will not involve hot cutting the live service of either SBC retail or CLEC customers and therefore conducting the test will not impact service to any end user customer. However, the use of working test lines will provide the tester with some insight as to the quality of SBC's hot cut performance and the impact that performance may have on end user service quality.

Stage Two of the test incorporates SBC's MIP and allows the testing of the BHC process in actual deployment using live commercial customers. This second stage commences only after the first stage is deemed complete. The MIP stage is simply the commercial deployment of the new process in a managed manner – jointly managed and monitored closely by both sides of the transaction (SBC and CLEC). It calls for the planning and execution of moving actual customer lines (UNE-P, Resale or Retail) to the CLEC's own switch, or to a third party providing switching to the migrating CLEC, in a manner that allows close examination of the process on a daily basis if warranted, with immediate response to any issues encountered by any party, to ensure that the processes are working as intended.

Purpose

The overall objective of the Joint Test Plan (or "JTP") is to ensure that the Batch Hot Cut processes and tools introduced as part of the Batch Hot Cut proceeding, as ordered by the Commission's June 29, 2004 order in Case No. U-13891, are working correctly and that SBC is able to support the volume of batch hot cut orders that can be expected as CLECs move to their own facilities. The JTP, therefore, should allow the Commission to "evaluate whether SBC is capable of migrating multiple lines in a timely manner" assuming the volumes of BHCs that could be anticipated when UNE-L replaces UNE-P. (June 29th Order at 22).

Stage One: The purpose of this stage of testing is to assess the operational aspects of the SBC's proposed batch hot cut process by simulating the migration of working "hot" lines from one carrier's switch to another carrier's switch using the batch hot cut process and associated operational support system (OSS) enhancements made by SBC Michigan to support this process. The test will also involve daily hot cut volumes that are greater than those that the SBC is experiencing in the current environment. These volumes will be expected in a competitive environment where UNE-P is no longer available. A key aspect of this test plan is that it puts concern for the quality of service the industry provides to the end user customer as its number one priority. This test will not involve hot cutting the live service of either SBC Michigan's retail customers or CLEC's customers and therefore the conduct of the test will not impact service to any end user customer. Yet, the use of working test lines will provide the tester with insight as to the quality of the SBC's hot cut performance and the impact that performance may have on end user service quality. During Stage One other important Pre-Test Preparation as set forth below will be completed.

Stage Two: The purpose of the MIP stage of the JTP is to establish the roles, responsibilities and actions that will be used to jointly assess the success of implementing the SBC's BHC processes in actual production. The managed introduction plan uses actual in-service migrations and utilizes close monitoring by key SBC and CLEC personnel of the actual execution of orders to cut in-service UNE-P or resale lines (i.e., the embedded base) to the CLEC's own switch or to a third party. The goal of this final stage of the JTP is to ensure that Michigan's consumers will not be harmed or lose service, for an unreasonable period of time compared to existing hot cut processes, due to failures in the BHC processes.

The test should take place over a sufficient time period (six months to a year) to be able to evaluate the testing results and this testing should take place with multiple CLECs in numerous central offices throughout the state, both manned and unmanned. In conducting this test, hot cut volumes should vary on a day-to-day basis, with spikes and valleys, to simulate real-world volumes. SBC Michigan's provisioning workforce should not have advance notice of any variation in volumes, except for that notice normally provided in a commercial setting, and must also handle the work ordinarily required by regular provisioning and maintenance / repair.

TEST PLAN

The participating carriers (including SBC and interested CLECs) and the MPSC Staff and/or its designated test facilitator will complete a final test plan that includes the following elements.

Overall Key Test Criteria and Assumptions:

- A neutral third party selected by the test stakeholders who will administer and oversee the test and will report out on the test results and findings. The test administrator may be the Commission staff or its designate. In the alternative, a joint CLEC/SBC/Staff committee will be formed to administer testing.[2]

- The test administrator will have access to each SBC and/or CLEC central office in which the test is being conducted.

- All required SBC OSS modifications have been implemented.

- SBC Michigan staffing is in place to handle the increased hot cut work loads.

- SBC Michigan will ensure that all work groups impacted by process changes are adequately trained before testing commences. SBC will also schedule formal training of SBC and CLEC personnel in the BHC procedures. Training can done with OSS training but must be specific to the BHC process.

- Success criteria and measurement standards for each stage of the test are defined and agreed to by the parties involved (SBC Michigan, CLECs and Commission staff) prior to the start of the test.

- The test shall include the entire BHC process. Rigorous testing ensures that the various issues and concerns affected parties will be identified, multiple scenarios will have been examined, and processes to handle under-performing COs will be established. All scenarios identified in the Commission's Order scenarios should be examined from a logistics, scheduling, OSS, billing, customer care, and performance metrics stand-point. The migration scenarios such as CLEC to CLEC, EELs, IDLC and line-sharing/line-splitting that were highlighted in the Commission's Order must be included in the test. These migration scenarios need to be discussed and included as early in the testing as possible so the Commission can evaluate the testing results of the complete BHC process.

Stage One – Pseudo Facility Testing

Stage One Test Entrance Criteria and Key Test Assumptions

The test plan will incorporate the following key Entrance Criteria and Test Assumptions:

- CLEC participation with spare collocation terminations will be available to achieve much of the desired test migration volumes.

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[2] The CLECs indicated during collaboratives that they are open consideration of alternative modes of test administration.

- SBC Michigan will fill the gaps that arise with the availability of either spare collocation facilities or with the desired central office mix needed for the test that can not be filled by the participating CLECs. SBC will accomplish this by creating its own "pseudo collocation" facility with backhaul facilities to another SBC switch in a different central office.

- Test accounts will include both "live" UNE-P accounts and "live" retail accounts. These accounts will be established using spare SBC loop facilities connected to spare SBC switch ports. These switch ports will be activated with actual telephone numbers which can be ported during the course of the test using standard number porting procedures.

- Test accounts will consist of single and dual line residential accounts and multi-line business accounts.

- A proportionate sub-set of the test lines will be built on IDLC facilities.

- Testing will be conducted for 20 consecutive working days in each central office. Routine or normal central office activity shall continue during the test.

- All test accounts will be cabled to a test panel of RJ-11 jacks in a secure area within SBC's central office to allow the test administrator to monitor the service quality of the accounts pre and post hot cut migration.

- A representative sample of the central offices across the SBC Michigan footprint will be included in the test. This sample must include offices that are both staffed on a regular basis and offices that are typically unstaffed and require technician dispatches to provision the hot cuts. The mix should also include a sampling of remote central offices that are served off of a host switch.

- The volumes to be tested will be determined based on hot cut volume projections in a marketplace where UNE-P is no longer a service option. These volumes must account for the conversion of the embedded base of UNE-P lines, future UNE-L migrations to CLECs as a result of normal CLEC customer acquisition activity and customer churn between CLECs and from CLECs back to SBC Michigan (win-backs).

- Standard EDI or GUI ordering interfaces will be used to place the hot cut orders using current LSOG business rules.

- Test progress and results will be reported to all test stakeholders by SBC Michigan (through the test administrator) on a periodic basis at intervals agreed to by the parties prior to the start of the test.

- CLEC-to-CLEC migrations and win-back migrations will be included in Stage One testing to allow for reuse of the test accounts thereby minimizing the number

of test accounts that will need to be built. These types of hot cut activities will be typical in a competitive environment without the availability of UNE-P. Therefore, aside from saving on the number of test accounts that will need to be built, including this type of migration activity makes sense to more realistically simulate the types of hot cut migration activities the SBC will face.

Stage One Test Limitations:

The parties acknowledge that to eliminate any impact to actual customer service Stage One uses "live" test accounts in lieu of actual end user lines in the hot cut migration process. As such, the test plan will be limited by the number of test lines that can be established and the number of SBC central offices involved with the test. Therefore, the test cannot fully simulate the SBC's hot cut performance throughout the SBC's footprint.

The parties also acknowledge that the test is not totally "blind" to SBC employees participating in Stage One of the test. The parties also acknowledge that continued retesting may be required as a result of failure on the part of the SBC and this will impact the blindness of the test. Reasonable attempts will be made to limit the notice given to central office personnel that a test is in process. The parties agree that the volume of orders place should be confidential during the course of the test.

The parties acknowledge that because actual customer accounts are not being used, maintenance and repair processes on troubles caused by the hot cut process cannot be tested in Stage One.

The parties acknowledge that Stage One of the test will focus only on the pre-ordering, ordering and provisioning aspects of the SBC's proposed batch hot cut process.

Stage One Pre-test Preparation:

Stage One of the test will require the following preparation:

- Test administrator/committee or alternative proposal is identified and agreed to by the parties.
- Detailed test plan is written and agreed to by the parties.
- Participating CLECs are identified and spare collocation capacity to be used for the test is determined.
- If necessary, additional central offices are identified to be included in the test to fill-in the gaps not covered by central offices where there are participating CLEC collocations.

- If necessary, SBC will established "pseudo collocation" facilities and associated back-haul facilities to different SBC switches.

- Daily hot cut test volumes are determined by the parties on record in Case U-13891.

- Test accounts are built under the guidance of the test administrator. The number of test accounts required will be based on the test volume objective.

- Test accounts are cabled to RJ-11 jacks within the SBC central office to allow for the monitoring of each account.

- Migration schedule is developed by the test administrator to meet the daily hot cut volume objectives.

- Parties will establish the success/exit criteria for Stage One of the test. These criteria should be based on existing or proposed hot cut metrics and the standards for these metrics.

- Parties will review and concur that all test entrance criteria have been met.
- Stage One can not be completed until all of the following have been completed:

A. SBC shall provide to all participating parties a complete set of all process documentation for the July 24, 2004 release (Release 16.0), including documentation for the use of all OSS and new tools being deployed. This should be accomplished no later than August 30, 2004.

B. All testing plans, scenarios, and test results for SBC's July 24, 2004 release (Release 16.0) including all defects identified, corrections made, and any corrections that are pending must be provided to all participating parties. This should be accomplished no later than August 30, 2004, and updates by SBC should be provided on a timely and continuous basis. SBC SMEs will meet with CLECs to review the testing and the results.

C. The SBC process of July 24, 2004, must be modified no later than September 30, 2004, so as to allow for the scenarios which follow. All testing for these scenarios may include situations where one CLEC is acting as a wholesaler for another CLEC:

- a due date no longer than 10 business days;
- IDLC migrations;
- line sharing/line splitting migrations;
- CLEC to CLEC migrations; and,
- EEL migrations.

D. If the parties can not agree how to implement the processes referenced in paragraph C above (the "SBC Modified Process"), then the parties should use the dispute resolution process as developed in Case No. U-12320 and file a motion for

dispute resolution in Case No. U-13891 no later than September 30, 2004 for the establishment of the SBC Modified Process.

E. SBC shall provide to all participating parties a complete set of all process documentation for the SBC Modified Process, including documentation for the use of all OSS and new tools being deployed before testing can begin.

F. Performance metrics must be developed for the SBC Modified Process using the review process ongoing in Case No. U-11830. The parties can begin discussions in Case No. U-11830 at any time on this issue, but there must be either agreement among the parties (or an order from the Commission) detailing how the SBC Modified Process will be implemented before the performance metrics can be developed. Testing under this Joint Testing Plan can not begin until these performance metrics have been developed.

G. SBC and CLECs who wish to participate in the test must enter into an amendment to their interconnection agreements to set terms and conditions (including pricing) for the SBC Modified Process. Discussions among the parties on this issue can begin at any time. If necessary, parties can file appropriate pleadings for dispute resolution following the terms and conditions of their individual interconnection agreements to resolve the language of any such amendment. All such motions, petitions, applications or complaints for dispute resolution should be filed no later than September 30, 2004. For example, if an interconnection agreement provides that parties must serve a letter invoking dispute resolution and wait at least 30 days before filing a motion, petition, application or complaint for dispute resolution, such letters should be served no later than August 30, 2004.

Stage One Test Execution & Evaluation:

At the start of the test each participating CLEC will follow the migration schedule that was developed by the test administrator. Each CLEC will issue the Local Service Requests ("LSRs") necessary to migrate the accounts that have been "assigned" to that CLEC from the SBC's switch to the CLEC's switch. Standard pre-ordering and ordering interface tools normally used by each CLEC (EDI or GUI) will be used to issues these LSRs. The CLEC will follow the batch hot cut ordering guideline established by the SBC to issue these orders. In the case of the test accounts that were established in SBC central offices where there is no CLEC participation the test administrator (or its designate), acting as a pseudo CLEC, will issue the LSRs to migrate these accounts to the collocation arrangements established by the SBC.[3] This process will continue until such time as all orders have been issued using the service intervals established by the SBC.

During Stage One of the process the test administrator will monitor and report on measures such as

- FOC timeliness,
- requested due dates confirmed,

[3] Alternatively, one of the participating CLECs could issue these orders on behalf of the test administrator. These details can be worked out during the development of the detailed test plan.

- average offered interval,
- availability and accuracy of scheduling and tracking tools,
- order flow through rates, and
- trouble reports/installation failures,

assuming these criteria are among those agreed to by the parties to evaluate the success of the SBC's batch hot cut ordering process.

Prior to the scheduled cutovers the test administrator will visit each of the central offices involved in the test to ensure that each test line has dial tone and the proper telephone number assigned to it. (Alternatively, SBC will confirm by a method acceptable to the test administrator that each test line has dial tone and the proper telephone number assigned to it.) Additionally, when cutovers are scheduled the test administrator will staff each central office involved with a cutover on that day to monitor the status of the test lines to ensure outage time associated with the hot cut is minimized. All extended service outages will be recorded by the test administrator and will be included in the final report.

During the hot cut provisioning stage of this test, in addition to the service quality aspect of the cutover, the test administrator should evaluate such criteria as:

- the SBC's ability to meet the confirmed hot cut due date,
- the timeliness of the hot cut,
- the timeliness of the notification to the CLEC that the hot cut has been completed, and
- the timeliness of jeopardy notices issued by the SBC for hot cuts it cannot complete, again assuming these criteria are agreed to by the parties.

Once the first round of orders has been issued and all the test lines have been migrated per the initial schedule, the process will continue such that the CLECs will issue orders to migrate the test lines from the original CLEC to another participating CLEC to the extent possible.[4] Additionally, SBC will issue orders to "win-back" test lines from the CLEC which will also result in a reverse hot cut to remove the line from the CLEC's collocated facility to be connected to the SBC switch.

Migrations activities will be based on a schedule developed by the test administrator. These CLEC-to-CLEC and reverse hot cuts will also be monitored by the test administrator for quality and timeliness. This process of retail-to-CLEC, CLEC-to-CLEC and win-back migrations will continue until the objective test hot cut volumes have been met.

Test Exit Criteria:

[4] This can only be accomplished where there are two or more participating CLECs collocated in the same central office.

Stage One of the test will not be completed (and Stage Two may not commence) until the test administrator has issued written findings stating:

- All Pre-Test Preparation and all test objectives have been met and evaluation criteria has been passed by SBC Michigan.

At any point in Stage One of the test, the test administrator may issue written findings determining that SBC Michigan's processes or systems are flawed and need to be reworked before Stage Two of the test may commence.

STAGE TWO – MANAGED INTRODUCTION PROCESS

After Stage One is deemed complete, SBC should implement its MIP process. Stage Two of the JTP, by definition, will be performed on a CLEC specific basis with that CLEC's existing UNE-P or resale customers. SBC Michigan should enter into a MIP/JTP with each and every interested Michigan CLEC that has an existing embedded UNE-P base that "volunteers" and begins the MIP within 90 days of the completion of Stage One.

The basic prerequisite that will apply to Stage Two of the JTP is that one or more CLECs need to volunteer to cut its/their embedded base of UNE-P/resale, in total or in part, from UNE-P/resale to its own switch or to a third party providing switching to the migrating CLEC. The CLECs can inform Staff of their decision to participate in Stage Two, but CLECs and Staff should not notify SBC or negotiate with SBC in advance of any batch hot cut orders other than using the SBC Modified Process. This will ensure that the test is blind to SBC and other participants.

For a CLEC to volunteer, it may need an executed interconnection agreement ("ICA") amendment covering the new batch hot cut processes. Standard EDI or GUI ordering interfaces will be used to place the hot cut orders using current LSOG business rules. Therefore, the CLEC will need to be able to utilize OSS release 6.04, either on an application-to-application (EDI or CORBA) or GUI (WebLEX / Verigate) basis. It is critical that all parties fully understand the BHC processes and their responsibilities within those processes. SBC will provide self-paced, on-line training on the BHC processes by September 7, 2004. This training will include the specifics of the "what, where, when and how" related to the approved BHC processes performed by SBC. Training shall be a part of the test plan, including establishing who may receive training and when training can begin. The training will be at no cost to participants. In order to cut the loops, the CLEC must have an end-office switch or have arrangements in place with a switching provider. Finally, collocation should be established in the wire centers where the loops are located, with transport established to the new switch.

Establishment of Teams

Joint Test Administration Committee

A joint CLEC/SBC/Staff committee will be formed to administer all testing. This Joint Test Administration Committee will consist of one member from each participating CLEC, SBC Michigan and Staff. The purpose of the committee will be to oversee every phase of test administration and reporting of test results and findings to the Commission.[5]

The JTP must be jointly developed by SBC Michigan, the test administrator (or administration committee), and CLEC participants, and be performed by teams consisting of SBC Michigan and CLEC representatives. The function of the test administrator is to facilitate communications between SBC and the CLECs, to provide mediation services when disputes arise, to collect information on operational activities and data on SBC's performance, and to assist in presenting disputed issues to the Commission.

During the test, the SBC and CLEC teams will closely monitor the progress during the testing period of the batch hot cut option, and will work through any issues that might arise during early commercial use. As described below, to address such issues, they would perform root cause analysis, develop corrective action plans and implement process changes that may be necessary.

The teams will also furnish the Commission and the test administrator with monthly reports (or more frequent reports at the request of the Commission or the test administrator) that would describe any batch hot cut problems that the team identified: explain the root cause; identify steps taken or proposed to achieve resolution; and report the status of the corrective action and the results to date.

All root cause analysis should be performed in the open. Reports should be issued as soon as a problem is detected and the root cause analysis has begun. A process should be available to determine whether the problem impacts all CLECs and how it impacts "normal" hot cuts being performed during the same period. The problems are critical, particularly if they impact customers. The process should include un-involved participants in order to resolve/identify issues that are in contention. Retesting of the same transactions must be performed after corrective action is taken.

Other expected day to day activities are expected to continue during the test. For example, winbacks and migrations to other CLECs can continue to happen while the testing is going on. Also, a CLEC that is involved in the tested may simultaneously sending orders for other things. Different types of orders may be sent as part of the test, including conflicting orders, orders to disconnect the customer, orders from other CLECs to move the customer back, normal trouble handling during the process, etc.

The team should be chaired by an impartial observer. All participating CLECs should have a representative on the team. Multiple CLECs may participate. A test plan should not be required for each CLEC. There should be a single test plan which should include all participating parties.

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[5] Assumes that the confidentiality issues surrounding a specific CLEC's test results are addressed.

SBC Team Members

SBC provides team members covering the operational aspects of the BHC processes:

- Local Service Center ("LSC") (name, title, and contact information)
- Local Operations Center ("LOC") (name, etc...)
- Local Facilities Organization – Inside ("LFO-In") (name, etc...)
- Local Facilities Organization – Outside ("LFO-Out") (name, etc...)
- Operations Support Systems ("OSS") (name, etc...)
- Account Team (name, etc...)

SBC's team members will be assigned to participate in and/or closely monitor the progress of each stage of this early commercial usage. Each identified subject matter expert ("SME") listed above should be the main point of contact for any issues raised in their field. SBC will also appoint a "team leader" to be the overall point of contact and coordination throughout the managed introduction. Additional support personnel from each of the organizations will also be assigned to ensure that any issue raised during the implementation can be addressed in an expedited fashion.

CLEC Team Members

Each CLEC that participates in migrating its existing UNE-P or resale customers to its own switch or to a third party providing switching to the migrating CLEC, will also assign personnel involved in the operational aspects of hot cuts from the CLEC's perspective. This should include personnel with responsibility for the CLEC's OSS, service center functions, and provisioning functions. Each SME identified and assigned above should be the main point of contact for any issues raised in their field. Each CLEC should also identify a "team leader" to serve as the overall point of contact and coordination throughout the managed introduction.

A CLEC may include another CLEC (s) as a non-participating observer as a member of its team. SBC Michigan will only be required to participate in the JTP with the participating CLEC.

MPSC Staff Team Members

The MPSC Staff may appoint an individual(s) to monitor activity as resources and expertise are warranted.

Test Approach

The overall philosophy of Stage Two of the joint test is to review, by monitoring commercial use, each step in the approved interim BHC processes from any pre-order inquiry to ordering to provisioning to completion, including updates being posted to the Provisioning WebSite ("PWS"). The evaluation will be to confirm and validate the availability of personnel, and the completeness, consistency and reliability of the interim BHC processes.

General Test Process

Monitored accounts will consist of the CLEC's existing single and dual line residential accounts and multi-line business UNE-P accounts migrating to UNE-L within the scope of the interim BHC processes. The monitored accounts may include a representative sample of the central offices across the state in which the CLEC has existing UNE-P accounts. This sample may include offices that are both staffed on a regular basis and offices that are typically unstaffed and require technician dispatches to provision the hot cuts. To the extent applicable, the mix may also include a sampling of remote central offices that are served off of a host switch.

Due dates will be calculated using the Scheduling Tool based on the process selected. CLECs will issue orders using EDI and the WEB LEX GUI following the business rules and using the software provided in Release 6.04. Pre-order transactions will be via EDI, CORBA, or the Enhanced Verigate GUI as the CLEC decides. Orders status for the orders will be tracked via the PWS tool. Orders will flow through as "normal."

Success criteria and performance measurement standards for the test are defined and agreed to by the parties involved (SBC, CLECs and Commission staff) prior to the start of the test, or otherwise determined by the Commission. The existing hot cut measures can be used to track performance, modified to reflect the appropriate BHC intervals of the approved processes.

Prior to the MIP, SBC will ensure that its performance measures have been updated to reflect the BHC process and performance. Collaboration and potential Commission resolution of any PM disputes should predate the MIP. SBC will make available all raw data concerning its MIP BHC performance to the CLECs.

The Processes and OSS to be Reviewed

Each SBC proposed BHC process, now approved by the Commission on an interim basis, is comprised of multiple steps. Each party conducting the step is identified (whether a particular group within SBC or the CLEC). Each of these steps could be a "test point" in the review. That is, each step in the process could be a point reviewed under this Joint Test Plan to determine whether it was completed as appropriate. In addition, monitoring will include use of the OSS enhancements made available for the BHC processes, which include:

- Due Date scheduler: ensure that this tool is available to all CLECs via SBC's EDI , CORBA and Enhanced Verigate interfaces and that it provides accurate and timely responses to requests for due dates. Ensure that scheduling is available for all types in the interim approved BHC processes.

- IDLC identification tool: ensure that this tool is available to all CLECs via SBC's EDI, CORBA, and Enhanced Verigate interfaces and that it provides accurate and timely indications of the presence of IDLC on the requested loop.

- Provisioning Web Site tool: ensure that this tool provides accurate and timely updates to provisioning order status on Coordinated Hot Cuts and Frame Due Time orders, including cut status at item level, results of ANI/dial tone testing, etc.

These processes were thoroughly documented in Exhibit A-13 (CAC-1); specifically in Chapman's Exhibit CAC-1.1. Those processes are:

- Enhanced Daily Process (pp. 5-7)
- Defined Batch Process (pp. 11-13)
- Bulk Project Process (pp. 16-18)
- IDLC Process (p. 22)

Additionally, Chapman Exhibit CAC-1.1also detailed other related processes that may be encountered:

- Pre-Cut Jeopardy Notification Process (p. 24)
- Throwback Process (p. 27)

For ease of reference, the above delineated items are included in the attachment.

There should be no communications regarding pending or anticipated orders other than by following the SBC Modified Process which is the subject of the test. Otherwise, the SBC Modified Process would not be the subject of a real test.

Timelines

The test should take place over a sufficient time period (to be determined by the parties to the JTP or the MPSC, in the event of a dispute, but in any event, at least 20 business days in each affected central office) to be able to evaluate commercial results. Routine or normal central office activity shall continue during the test. The timeframes estimated above plus any additional time to resolve identified issues and analyze results should be sufficient to ensure the goals of the test are met.

ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION FOR STAGE ONE AND STAGE TWO TESTING

The purpose of the team(s) established, as described above, is to both closely monitor the progress of early commercial use of the batch hot cut processes and resolve any issues that might arise during testing and early commercial use. To address such issues, the team would perform root cause analyses, develop corrective action plans and implement process changes that are deemed necessary. After any corrective action is executed, the teams then would continue their monitoring to ensure that the corrective action functions as expected. Thus, in sum, the teams' tasks under this root cause analysis and corrective action section are: find it, fix it, and ensure the fix worked.

Root cause analysis and corrective action will be performed for issues in both Stage One and Stage Two. Root cause analysis and corrective action will be performed for issues raised for both SBC and CLEC processes. That is, whether the issue is found on SBC's side of the transaction or the CLEC's side of the transaction, it should be addressed by the appropriate team members.

SBC and the participating CLEC will disclose all pertinent BHC performance/corrective action information to other participants, to the test administrator and to the Commission Staff. In other words, the same information available to each SBC and CLEC "team" working on the JTP will be available to any the other participating team. In addition, each participating party to the JTP must be able to identify problems with the early commercial release of the BHC process and the responsible party must be obligated to respond to those JTP-identified issues with a publicly available root cause analysis and corrective action plan(s). All corrective actions taken during the JTP will be fully disclosed by that party to the other parties. If any JTP party believes that the other JTP party has failed to take proper corrective action to alleviate any BHC problem, it can raise that issue with the Joint Test Administration Committee.

REPORTING

Monthly interim reports will document the progress made each month until the review period is completed. The report shall describe the milestones achieved. It shall include quantitative data as available from what hot cuts were performed, including: quantities by type of cut and process used and performance results for the pre-order inquiries and LSRs involved. The tracking spreadsheet developed by the CLEC will serve as the basis for collecting data to be reported.

The monthly reports will also document any issues raised, the results of the root cause analysis performed, the corrective action planned if required, and the implementation of any correction action. This will summarize the issues identified on both sides of the transaction (SBC and CLECs). This portion of the reporting could be modeled after the reporting completed in 2002 and 2003 related to Line Loss Notifications.

Monthly interim reports would be shared between SBC, the involved CLECs, the test administrator, and the MPSC Staff. Dissemination of the interim reports (or a form thereof) should be subject to an agreed confidentiality agreement that protects any individual CLEC-specific or SBC trade secret or competitively sensitive information. The final report would be filed with the Commission, subject to the same confidentiality safeguards.

No party may self-declare that the testing has been successfully completed in the final report. A finding of successful completion can only be made by consent of all participating parties to the JTP, or by a ruling from this Commission on a petition for dispute resolution.

DISPUTE RESOLUTION PROCESS

If dispute resolution is needed then the process as developed in Case No. U-12320 for dispute resolution will be followed, and parties may file a motion for dispute resolution in Case No. U-13891.